

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

**EXHIBIT A**

1 CAUSE NO. D-1-GN-18-001605  
2 MARCEL FONTAINE, ) IN THE DISTRICT COURT  
3 Plaintiff, )  
4 vs. ) TRAVIS COUNTY, TEXAS  
5 INFOWARS, LLC, FREE )  
6 SPEECH SYSTEMS, LLC, and )  
7 Defendants. ) 261ST JUDICIAL DISTRICT

8  
9 ORAL AND VIDEOTAPED DEPOSITION OF  
10 BRITTANY PAZ, CORPORATE REPRESENTATIVE OF  
11 FREE SPEECH SYSTEMS, LLC  
12 February 15, 2022  
13

14 ORAL AND VIDEOTAPED DEPOSITION OF BRITTANY PAZ,  
15 CORPORATE REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC,  
16 produced as a witness at the instance of the Plaintiff  
17 and duly sworn, was taken in the above-styled and  
18 numbered cause on February 15, 2022, from 9:03 a.m. to  
19 3:34 p.m., before Amy M. Clark, Certified Shorthand  
20 Reporter in and for the State of Texas, reported by  
21 computerized stenotype machine at the offices of Kirker  
22 Davis, LLP, 8310-I North Capital of Texas Highway, Suite  
23 350, Austin, Texas 78731, pursuant to the Texas Rules of  
24 Civil Procedure and the provisions stated on the record  
25 or attached hereto.

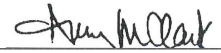

Paz, Brittany

02-15-2022

<p style="text-align: right;">198</p> <p>1 of costs of products that were not paid to PQPR.  2 Q. Okay. How many -- how long has that debt been  3 accruing?  4 A. I think that that debt was accruing up to a few  5 months ago, and I don't know when it started,  6 unfortunately. I could tell you the reasons why it was  7 accruing, but I don't -- I don't know when it was  8 started to be accruing.  9 Q. All right. Let me see those real quick.  10 A. This one?  11 Q. Yeah. This stack of (inaudible) here -- yeah.  12 Okay.  13 Who -- what -- how did we get to a  14 \$53 million note?  15 A. Sure. So PQPR is the company that purchases  16 the products that are ultimately sold on the Infowars  17 website. And for a number of years -- and I'm sorry I  18 don't know for how long -- all of the money was flowing  19 to Free Speech Systems instead of being paid to PQPR.  20 They were kind of just giving the money here and there,  21 but with no regularity. And so the amount of money that  22 was owed to PQPR for those products totals that amount  23 of money.  24 Q. Okay. Who at PQPR was able to front  25 \$53 million?</p>	<p style="text-align: right;">200</p> <p>1 A. Right. So five days -- so, yes. So per five  2 business days, \$11,000.  3 Q. The --  4 A. Plus the percentage.  5 Q. The -- when you say it started a few months  6 ago, when?  7 A. I believe that -- based on my conversations  8 with Mr. Roe, the financial disentanglement between the  9 two companies happened within the last few months,  10 perhaps back to September. But it's relatively recent.  11 Q. Do you know what triggered that?  12 A. I know that Mr. Jones had begun some -- some  13 estate management that was in -- in motion in the years  14 prior. And I also know that PQPR and an attorney  15 associated with PQPR retained Mr. Roe as a consultant to  16 try to disentangle this. I can't say as to when he  17 was -- he was retained to do that. He wasn't retained  18 by Free Speech. He was retained by -- by I believe an  19 attorney -- I can't remember his name -- on behalf of  20 PQPR.  21 Q. His name's Eric Todd.  22 A. I don't think that's the person that retained  23 him, no.  24 Q. The only reason I say this is because  25 Mr. Whittenburg is the attorney you're talking about</p>
<p style="text-align: right;">199</p> <p>1 A. I don't know -- I can't answer anything for  2 PQPR. I don't represent them as a corporate  3 representative.  4 Q. Sure.  5 A. I don't know.  6 Q. In -- where did you learn about PQPR?  7 A. When I was discussing the structure of the  8 company from Melinda and how the -- the money is paid  9 from Free Speech to PQPR and who has ownership interests  10 in PQPR and Free Speech. That's how I found it out.  11 Q. How --  12 A. Based on my conversations.  13 Q. How is the money paid?  14 A. Now how is it paid to PQPR? I can say now how  15 it is. Previously, I don't know.  16 So within the last few months, there is  17 this debt, and Free Speech has been attempting to pay  18 this debt down. It pays PQPR \$11,000 per week -- I  19 believe it's per business day -- five business days. So  20 it's not seven business days, five -- five business  21 days -- plus a percentage of the products that are sold  22 on the site in attempt to address the backlog.  23 But prior to the last few months when it  24 was -- it wasn't being paid with any regularity.  25 Q. So 11,000 -- so \$44,000 every 20 days?</p>	<p style="text-align: right;">201</p> <p>1 that was retained, correct?  2 A. No. That's not accurate.  3 Q. Well, then who is the attorney that was  4 retained?  5 A. Like I said, I don't remember his name.  6 Q. So you don't remember the name of anybody  7 that -- of the person that represents PQPR. You don't  8 remember the attorney that was retained by that person  9 at PQPR.  10 A. I don't -- I'm not the corporate representative  11 for PQPR.  12 Q. I know.  13 A. So I don't know.  14 Q. Just trying to figure out what you know.  15 A. Yeah.  16 Q. So a lawyer at PQPR hired a lawyer?  17 A. No. The lawyer hired Mr. Roe.  18 Q. Gotcha.  19 A. Right. As a consultant.  20 Q. Okay. If you look at -- let's look at  21 Exhibit 15.  22 A. Okay.  23 Q. Do you see the redactions?  24 A. Yes.  25 Q. Why are those redacted?</p>

Paz, Brittany

02-15-2022

282	284
<p>1 Given under my hand and seal of office on this _____</p> <p>2 day of _____, _____.  3  4 _____</p> <p>5 NOTARY PUBLIC IN AND FOR  6 THE STATE OF _____</p> <p>7 My Commission Expires: _____  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p>	<p>1 of time used by each party at the time of the  2 deposition:  3 Mr. Bill Ogden (5h19m)  Attorney for Plaintiff  4 Mr. Mark Bankston (0h0m)  Attorney for Plaintiff  5 Ms. Jacquelyn Blott (0h05m)  Attorney for Defendants  6 That a copy of this certificate was served on all  7 parties shown herein on _____ and filed  8 with the Clerk.  9 I further certify that I am neither counsel for,  10 related to, nor employed by any of the parties in the  11 action in which this proceeding was taken, and further  12 that I am not financially or otherwise interested in the  13 outcome of this action.  14 Further certification requirements pursuant to  15 Rule 203 of the Texas Code of Civil Procedure will be  16 complied with after they have occurred.  17 Certified to by me on this 21st day of February,  18 2022.  19  20   21 Amy M. Clark, CSR  Texas CSR 8753  22 Expiration: 10/31/2023  Res Ipsa Litigation Support, LLC  23 Firm No. 11371  501 Congress Avenue, Suite 150  24 Austin, Texas 78701  (512) 334-6777  25</p>
283	285
<p>1 CAUSE NO. D-1-GN-18-001605  2 MARCEL FONTAINE, ) IN THE DISTRICT COURT  3 )  4 Plaintiff, )  5 )  6 vs. ) TRAVIS COUNTY, TEXAS  7 )  8 )  9 INFOWARS, LLC, FREE )  10 SPEECH SYSTEMS, LLC, and )  11 KIT DANIELS, )  12 )  13 Defendants. ) 261ST JUDICIAL DISTRICT  14  15 REPORTER'S CERTIFICATE  16 ORAL AND VIDEOTAPED DEPOSITION OF BRITTANY PAZ,  17 CORPORATE REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC  18 February 15, 2022  19 I, Amy M. Clark, Certified Shorthand Reporter in and  20 for the State of Texas, hereby certify to the following:  21 That the witness, BRITTANY PAZ, CORPORATE  22 REPRESENTATIVE OF FREE SPEECH SYSTEMS, LLC, was duly  23 sworn and that the transcript of the deposition is a  24 true record of the testimony given by the witness;  25 That the deposition transcript was duly submitted on  _____ to the witness or to the attorney for  the witness for examination, signature, and return to me  by _____.  That pursuant to information given to the deposition  officer at the time said testimony was taken, the  following includes all parties of record and the amount</p>	<p>1 FURTHER CERTIFICATION UNDER TRCP RULE 203  2  3 The original deposition was/was not returned to the  4 deposition officer on _____.  5 If returned, the attached Changes and Signature  6 page(s) contain(s) any changes and the reasons therefor.  7 If returned, the original deposition was delivered  8 to Bill Ogden, Custodial Attorney.  9 \$_____ is the deposition officer's charges to the  10 Plaintiff for preparing the original deposition and any  11 copies of exhibits;  12 The deposition was delivered in accordance with Rule  13 203.3, and a copy of this certificate, served on all  14 parties shown herein, was filed with the Clerk.  15 Certified to by Res Ipsa Litigation Support, LLC on  16 this _____ day of _____, _____.  17  18  19   20  21 Res Ipsa Litigation Support, LLC  22 Firm No. 11371  501 Congress Avenue, Suite 150  23 Austin, Texas 78701  (512) 334-6777  24  25</p>